



Connell Foley LLP
One Newark Center
1085 Raymond Blvd., 19th Floor
Newark, New Jersey 07102
P 973.436.5800 F 973.436.5801


Catherine G. Bryan

This case was reassigned to me. The application is granted. Discovery deadlines extended as set forth in the Revised Civil Case Discovery Plan and Scheduling Order, which will be separately docketed.

May

Via ECF

The Honorable Cathy Seibel, U.S.D.J.
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

SO ORDERED

Philip M. Halpern
United States District Judge

Dated: New York, New York
May 5, 2020

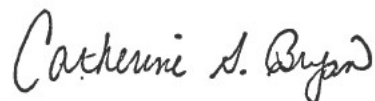
Re: Bruno v. Schindler Elevator Corporation
Civil Case Number: ~~7:19-cv-07644-CS~~

7:19-cv-07664-PMH

Dear Judge Seibel:

We represent Schindler Elevator Corporation in the above referenced matter. We write, on behalf of all parties, to request an extension of the deadlines in the October 31, 2019 Civil Case Plan & Scheduling Order (attached hereto as Exhibit A). The parties have exchanged written discovery and plaintiff's deposition took place on February 20, 2020. However, due to COVID-19 restrictions, the parties were not able to move forward with the deposition of Schindler Elevator Corporation or other necessary fact witness depositions. Additionally, plaintiff has been approved for an additional surgery, which has not yet been scheduled. After the surgery, plaintiff will need to be re-deposed. As such, the parties jointly request an extension of the discovery deadlines outlined in the October 31, 2019 Order. Attached hereto as Exhibit B is a proposed revised civil case discovery plan and scheduling order. Once plaintiff's surgery is scheduled, the parties may seek to amend the expert deadlines or supplement already served damages expert reports. This is the parties' first request for an extension of time of the discovery deadlines.

Respectfully submitted,



Catherine G. Bryan

CGB/pjk

Nicholas R. Farnolo, Esq.

May 5, 2020

Page 2

Enclosure

cc: All parties via e-filing